

MEMO ENDORSED

THE LAW OFFICE OF

MILLSAPS & ASSOCIATES PLLC

July 25, 2022

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: Sept 13, 2022

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *Goolden v. Wardak and Wardak v. Goolden*, No. 19-CV-6257 (ALC)(VF)

Dear Judge Carter,

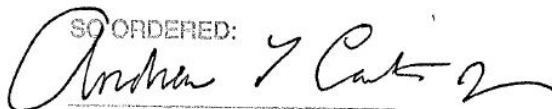
I am counsel of record for Defendant/Counterclaim-Plaintiff Hamed Wardak in the above-referenced matter. Concurrently with this letter motion, my firm and I are filing a motion to be relieved as counsel in this case. Pursuant to Sections 6(C) and 6(D) of Your Honor's Individual Practices, we write to request an Order to place the Declaration of Rhett O. Millsaps II dated July 25, 2022, (the "Declaration") under seal.

“[D]ocuments in support of motions to withdraw as counsel are routinely filed under seal where necessary to preserve the confidentiality of the attorney-client relationship between a party and its counsel, and [] this method is viewed favorably by the courts.” *Karimian v. Time Equities, Inc.*, No. 10 Civ. 3773(AKH)(JCF), 2011 WL 1900092, at *2 (S.D.N.Y. May 11, 2011) (quoting *Team Obsolete Ltd. v. A.H.R.M.A. Ltd.*, 464 F.Supp.2d 164, 165 (E.D.N.Y.2006)). The Declaration contains information pertaining to a conflict between this firm and Mr. Wardak and describes attorney-client communications related to this case. While Mr. Wardak has himself placed these matters at issue in our conflict, we respectfully request that the Court place the Declaration under seal to protect this sensitive information and to preserve any remaining confidentiality of the attorney-client relationship between Mr. Wardak and us.

Motion to Seal ECF No. 160 granted nunc pro tunc.
The Clerk of Court is respectfully directed to
terminate ECF No. 159.

Respectfully submitted,

/s/ Rhett O. Millsaps II

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated:
Sept 13, 2022

Outgoing Attorney for Defendant/
Counterclaim-Plaintiff Hamed Wardak

cc: All Counsel of Record (via ECF and email)
Hamed Wardak (via email)